

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

CYNTHIA GEIGER,

Plaintiff,

v.

RYAN FULLER SMALLWOOD,

Defendant.

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CIVIL ACTION NO.: 3:06cv194-WHA

**DEFENDANT RYAN FULLER SMALLWOOD'S EXHIBIT LIST**

The Defendant submits the following list of exhibits the Defendant may use as exhibits at trial. The Defendant may not use all of these exhibits at trial; however, the Defendant is attempting to comply with the Court's Order by listing all possible exhibits known to the Defendant at this time. The Defendant, by listing these exhibits, does not stipulate or admit that these exhibits are necessarily admissible. The Defendant is simply trying to provide a list of possible exhibits to the Plaintiff and to the Court.

The Defendant may also use any blow-ups or enlargements of any of the exhibits. The Defendant also adopts the Exhibit List of the Plaintiff; however by doing so, the Defendant does not stipulate or admit that these exhibits are necessarily admissible. The Defendant reserves the right to introduce documents or exhibits for rebuttal or impeachment purposes at trial. Further discovery and investigation may lead to other exhibits. The Defendant reserves the right to supplement his Exhibit List. The Defendant also reserves the right to use any exhibit attached to a deposition of any party or witness deposed in this case at any time. The Defendant also reserves the right to use any document utilized by any expert witness in this case.

All exhibits in the Defendant's possession are available for inspection at the undersigned's office located at 400 2<sup>nd</sup> Avenue in Opelika, Alabama:

The list of exhibits is as follows:

1. Any pleadings in this case.
2. Any exhibits to any depositions, specifically the depositions of Dr. William E. Adams and the Plaintiff Cynthia Geiger.
3. Any documents produced by the Plaintiff pursuant to Plaintiff's Initial Disclosures.
4. Any medical records, reports, or other documents pertaining to the Plaintiff received from Dr. William E. Adams.
5. Any insurance records, reports, or other documents pertaining to the Plaintiff received from United Healthcare.
6. Any insurance records, reports, or other documents pertaining to the Plaintiff received from GEICO.
7. Any medical records, reports, or other documents pertaining to the Plaintiff received from Columbus Regional/The Medical Center.
8. Any medical records, reports, or other documents pertaining to the Plaintiff received from Columbus Clinic, P.C.
9. Any insurance records, reports, or other documents pertaining to the Plaintiff received from BlueCross BlueShield of Georgia.
10. Any pharmaceutical records, reports, or other documents pertaining to the Plaintiff received from Walgreens Pharmacy.
11. Any medical records, reports, or other documents pertaining to the Plaintiff received from Columbus Diagnostic Center.
12. A diagram of the accident scene.
13. All photographs taken by anyone at any time involving this accident, including, but not limited to, photographs of the vehicles involved in the accident, photographs of the accident scene, and enlargement of said photographs, all of which are available for inspection.



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Stanley A. Martin  
Attorney for Defendant  
Ryan Fuller Smallwood

Post Office Box 2526  
Opelika, Alabama 36803-2526  
(334) 749-4142  
(334) 749-4131 FAX

**CERTIFICATE OF SERVICE**

I hereby certify that I have served an exact copy of the foregoing Exhibit List upon the following counsel of record, by depositing a copy of same in the United States Mail, properly addressed with first class postage prepaid thereon.

Honorable Benjamin H. Parr  
Post Office Box 229  
Opelika, Alabama 36803

This 16<sup>th</sup> day of April, 2007.



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Stanley A. Martin